



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

March 5, 2012

Erich Orth
Project Manager
Bonneville Power Administration – TEP-TPP-3
P.O. Box 3621
Portland, Oregon 97208-3621

Re: Comments on the draft EIS for Albany-Eugene Transmission Line Rebuild Project
(EPA Project Number 10-058-BPA).

Dear Mr. Orth:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the US Environmental Protection Agency (EPA) has reviewed the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DEIS) for the proposed **Albany-Eugene Transmission Line Rebuild Project** in Lane and Linn Counties, Oregon.

The DEIS analyzes potential environmental impacts associated with a proposal to rebuild a 32-mile long section of the Albany-Eugene 115-kV Transmission Line in Oregon. Components of the original line built in the 1940s have deteriorated and require replacement. In particular, wood pole structures supporting the line have reached their expected service life of 55-60 years, and BPA is proposing to replace them. The project would ensure reliable power supply and minimal safety risks to the public and line maintenance crews. Analysis of impacts from the project considered two action alternatives, the Proposed Action and No Action.

Under the Proposed Action, BPA would replace transmission structures and facilities within the existing 100-foot corridor Right-Of-Way (ROW) after vegetation clearance on nearly 56 acres, removal of 6,300 dangerous trees, and disturbance of about 56 acres for new access road construction and upgrade of existing ones. Structure replacement and access road construction would disturb no more than a total of 130.5 acres.

The EPA supports the goals of the proposed action. We believe that the DEIS provides adequate discussion of the potential environmental impacts associated with the proposed action. Therefore, the EPA has rated the DEIS as LO (Lack of Objections). An explanation of this rating is enclosed for your reference.

We would suggest that the final EIS include the following:

- Updated information on the status of the National Pollutant Discharge Elimination System (NPDES) permit application, and measures to protect water quality. The DEIS indicates that the proposed project would disturb more than 130 acres, of which 55 acres would be disturbed during construction of access roads and another 30 acres as staging areas, possibly causing increased erosion and discharge of sediment to nearby waterways.

- Updated information on how BPA will be working collaboratively with the Oregon Department of Environmental Quality to ensure compliance with Water Quality Restoration Plans that will function as BPA's share of the Upper Willamette River Total Maximum Daily Load (TMDL) implementation, designed to meet State and Federal water quality rules and regulations (p. 3-16).
- Outcomes of consultations with the US Fish and Wildlife Service and the National Marine Fisheries Service, including recommended measures to reduce risks and protect biota and habitat. Similarly, a discussion on work with Oregon Department of Fish and Wildlife will also be important.
- Information on an environmental inspection and mitigation-monitoring program to ensure compliance with all mitigation measures and assess effectiveness. The final EIS should describe the program and its use as an effective feedback mechanism so that needed adjustments can be made to meet environmental objectives throughout the period of the project. The DEIS states that up to 6,300 danger trees would be removed, which would suggest a lack of regular monitoring of the transmission line.

We appreciate the opportunity to review this DEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure
EPA Rating System for Draft EISs

cc: Oregon Department of Environmental Quality

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.